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ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

DHILLON HOSPITALITY, LLC,

Debtor.

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**CASE NO. 13-40845-btr
Chapter 11**

MOTION TO DISMISS CHAPTER 11 BANKRUPTCY CASE

NO HEARING WILL BE CONDUCTED ON THIS APPLICATION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS APPLICATION SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING UNLESS IT DETERMINES THAT AN EVIDENTIARY HEARING IS NOT REQUIRED AND THAT THE COURT'S DECISION WOULD NOT BE SIGNIFICANTLY AIDED BY ORAL ARGUMENT. IF YOU FAIL TO APPEAR AT ANY SCHEDULED HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

TO THE HONORABLE JUDGE OF THE UNITED STATES BANKRUPTCY COURT:

COMES NOW, **DHILLON HOSPITALITY, LLC** (“Debtor”), Debtor in the above-styled and numbered bankruptcy case and files this Motion to Continue Hearing on Disclosure Statement, and would respectfully show the Court as follows:

1. On April 1, 2013 (the “Petition Date”), **DHILLON HOSPITALITY, LLC** (the “Debtor”) filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), thereby commencing the above-captioned case (the “Case”).

2. The Debtor sold all its assets on or about June 4, 2014 pursuant to the Order Granting Amended Debtor’s Emergency Motion Pursuant to Sections 105(A) and 363 of the Bankruptcy Code and Bankruptcy Rule 6004 for Entry of Order Approving Sale of Debtor’s Assets [Docket No. 193].

3. The proceeds of the sale paid the liens of the Bank of the West, Craighead County Taxing Authority and a portion of the United States Small Business Administration’s secured claim. Holiday Hospitality Franchising, LLC has been paid in full.

4. The Debtor’s liabilities consist of (a) administrative expenses due to the United States Trustee of \$325.00; (b) priority creditors in the amount of \$47,939.11; (c) general unsecured creditors estimated at \$56,684.27 [\$16,193.00 of which is disputed]; and (d) the Small Business Administration (“SBA”) of \$289,177.00.

5. The Debtor has reached an agreement with the SBA that Jagmohan Dhillon will contribute \$300,000.00 to the Debtor’s estate to pay its administrative expenses and priority creditors in full and to pay the SBA and general unsecured creditors the remainder. Based on the parties’ calculation, the unsecured creditors and the SBA would receive approximately 70% distribution pro rata.

6. The funds will be deposited into Debtor's counsel's trust account prior to the dismissal. Upon the entry of the dismissal order Debtor will distribute funds to the creditors.

7. As to the disputed claims, the Debtor reserves its right to obtain a judicial decree as to those claims.

8. The Disputed Claims are :

Lamar Advertising Credit Dept. PO Box 66338 Baton Rouge, LA 70896	Unsecured Claim	\$16,193.00
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9. The Debtor believes this proposal is in the best interest of its estate and the remaining creditors because the Debtor has no assets or operations to otherwise pay its liabilities.

WHEREFORE PREMISES REQUESTED, Debtor requests the Court approve the Motion to Dismiss and grant the Debtor such other and further relief to which it may show itself justly entitled.

Dated: October 9, 2014

Respectfully submitted,

/s/ Arthur Ungerman

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 10, 2014, a true and correct copy of the foregoing document was served via facsimile where available otherwise pursuant to the Court's ECF system to those parties requesting notice in this case, and via United States first class mail, postage prepaid, upon the parties on the attached service list.

/s/ Arthur Ungerman

Arthur Ungerman